

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

COMMUNITY ASSOCIATION UNDERWRITERS OF  
AMERICA, INC. A/S/O VLY POINTE CONDOMINIUM  
ASSOCIATION

Civil Action No: 1:17-cv-00328-FJS-DJS

Plaintiff,

-against-

HODOROWSKI HOMES, LLC; ADIRONDACK  
DEVELOPMENT GROUP, LLC; NORTH EAST FIRE  
PROTECTION SYSTEMS, INC.; ABC  
CORPORATIONS 1 THROUGH 10 (FICTITIOUS  
NAMES) XYZ PARTNERSHIPS 1 THROUGH 10  
(FICTITIOUS NAMES) AND JOHN DOES 1 THROUGH  
10 (FICTITIOUS NAMES)

Defendants.

**NOTICE OF MOTION FOR ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the Affidavit of Jessica F. Napoli, Esquire dated June 14, 2017 and the affidavit of Daniel J. de Luca dated June 14, 2017, a motion will be made before this Court on a date to be decided for an Order pursuant to Local Rule 83.1(i), for admission of Daniel J. de Luca *pro hac vice* on behalf of Plaintiff, Community Association Underwriters of America, Inc. a/s/o Vly Pointe Condominium Association, and for such other and further relief as the Court may deem just and proper.

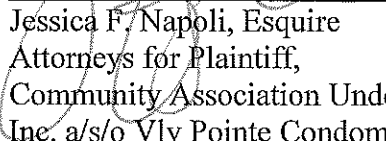
Dated:

New York, NY

Respectfully Submitted,

**Clark & Fox**

By:

  
\_\_\_\_\_  
Jessica F. Napoli, Esquire  
Attorneys for Plaintiff,  
Community Association Underwriters of America,  
Inc. a/s/o Vly Pointe Condominium Association  
404 5<sup>th</sup> Avenue, Third Floor  
New York, New York 10018  
[jnapoli@clarkfoxlaw.com](mailto:jnapoli@clarkfoxlaw.com)

**UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF NEW YORK**

**IN THE MATTER OF THE APPLICATION OF**

DANIEL J. de LUCA, ESQUIRE

**TO BE ADMITTED TO THE UNITED STATES  
DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF NEW YORK**

**ORDER**

Upon fulfilling the requirements set forth in Local Rule 83.1 of the Northern District of New York, DANIEL J. de LUCA, ESQUIRE is hereby accepted for

- ☐ Permanent Admission to practice in the United States District Court for the Northern District of New York.
- ☒ Pro Hac Vice Admission to practice in the United States District Court for the Northern District of New York for the particular case of :  
COMMUNITY ASSOCIATION UNDERWRITERS OF AMERICA, INC. v. HODORWOSKI HOMES, LLC ET AL .

IT IS SO ORDERED

Dated : \_\_\_\_\_

\_\_\_\_\_  
☐ U.S. District Judge  
☐ U.S. Magistrate Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

COMMUNITY ASSOCIATION  
UNDERWRITERS OF AMERICA, INC. A/S/O  
VLY POINTE CONDOMINIUM ASSOCIATION

Civil Action No: 1:17-cv-00328-FJS-DJS

Plaintiff,

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NAMES) XYZ PARTNERSHIPS 1 THROUGH 10  
(FICTITIOUS NAMES) AND JOHN DOES 1  
THROUGH 10 (FICTITIOUS NAMES)

Defendants.

SPONSOR'S AFFIDAVIT

STATE OF NEW YORK     )  
                                  S.S.:  
COUNTY OF NEW YORK    )

Jessica F. Napoli, Esquire being duly sworn, deposes and says:

1.     This affidavit is made pursuant to Local Rule 83.1(i), in support of the application for admission *pro hac vice* to the United States District Court for the Northern District of New York, of petitioner, Daniel J. de Luca, for purposes of representing Plaintiff, Community Association Underwriters of America, Inc.

2.     I am an attorney with the law firm of Clark & Fox, 404 5<sup>th</sup> Avenue, Third Floor, New York, New York 10018

3.     I am a resident of Kings County, New York.

3.     I have been a member of good standing of the bar of the State of New York since 2006 and the United States District Court for the Northern District of New York since 2011.

4. The petitioner possesses the character, fitness and moral qualifications necessary to practice law before this Court.

**Clark & Fox**

By: \_\_\_\_\_

Jessica F. Napoli, Esquire  
Attorneys for Plaintiff,  
Community Association Underwriters of America,  
Inc. a/s/o Vly Pointe Condominium Association  
404 5<sup>th</sup> Avenue, Third Floor  
New York, New York 10018  
[jnapoli@clarkfoxlaw.com](mailto:jnapoli@clarkfoxlaw.com)

Sworn to before me this 15th  
day of June, 2017.

  
\_\_\_\_\_  
NOTARY PUBLIC

**KEVIN J. BRASSIL**  
Notary Public, State of New York  
Registration #01BR5018311  
Qualified In New York County  
Commission Expires Sept. 27, 2017

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**IN THE MATTER OF THE APPLICATION**

**OF**

**PETITION FOR  
ADMISSION TO PRACTICE**

DANIEL J. de LUCA, ESQUIRE

:  
:  
:  
:

I, DANIEL J. de LUCA, ESQUIRE, being sworn, depose and say:

1. That I reside at 316 Powderhorn Road, Fort Washington, PA 19034 and my office address is Three Valley Square, Suite 220, Blue Bell, PA 19422.
2. That I was admitted to practice in the courts of the State of Pennsylvania on 12/15/1994, by the \_\_\_\_\_ Department.
3. That I graduated from Temple University's Beasley Law School on 1994 after having completed the required courses of study.
4. That I have never been held in contempt of court, censured, suspended or disbarred by any court.<sup>1</sup>
5. That I am also admitted to practice in the following States, territories, districts, commonwealths or other courts of the United States:

BAR	DATE
<u>New Jersey</u>	<u>12/19/1994</u>
<u>USDC-EDPA</u>	_____
_____	_____
_____	_____

6. That I have read, and am familiar with: The Judicial Code (Title 28 U.S.C.); the Federal Rules of Civil Procedure and the Federal Rules of Evidence for the District Courts; the Federal Rules of Criminal Procedure for the District Courts; the Local Rules and General Orders for the Northern District of New York; and the N.Y.S. Rules of Professional Conduct and will faithfully adhere thereto.

**WHEREFORE** it is respectfully requested that this court order that Petitioner,

DANIEL J. de LUCA, ESQUIRE, be admitted to practice before the Bar of this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 23, day of June, 2017.

  
\_\_\_\_\_  
**PETITIONER**

<sup>1)</sup> Discipline Orders issued by any Court prior to executing this Petition must be attached.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

NEW ATTORNEY E-FILING REGISTRATION FORM  
PLEASE TYPE

This form is used for creating new accounts (**Newly Admitted Attorneys Only**) on the Court's Electronic Case Filing System(ECF).

First Name: Daniel Middle Name: J  
 Last Name: de Luca If appropriate, check one: Sr. ☐ Jr. ☐ II ☐ III ☐  
 Firm Name: de Luca/Levine  
 Firm Address: Three Valley Square  
Suite 220  
 City: Blue Bell State: PA Zip Code 19422  
 Firm Phone Number: (215) 383-0081 Direct Dial Number: (215) 278-4081  
 Fax Number: (215) 383-0082 Internet E-Mail Address: khartman@delucalevine.com

The following information must be completed by attorneys applying for admission and submitted with your petition:

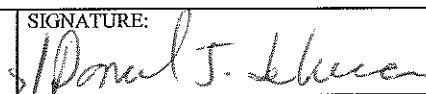
TYPE OF ADMISSION APPLIED FOR: ☐ PERMANENT ☒ PRO-HAC VICE - Case Number Required: 17cv328(FJS)

By submitting this printed and signed form, I hereby agree to abide by all Court rules, orders, policies and procedures governing the use of the electronic filing system (CM/ECF). I also consent to service by electronic means in the circumstances permitted under those rules, orders, policies and procedures. I understand that the combination of user i.d. (Bar Roll #) and password will serve as my signature for filing documents pursuant to Rule 11 of the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure and the Local Rules of this court. I agree to protect the security of my password and immediately notify the Clerk of Court if I suspect my password has been compromised. Also, as a participating attorney, I will promptly notify the Clerk of Court if there is a change in my personal data, such as name, e-mail address, firm address, telephone number, etc.

Attorney Signature: *[Signature]*  
 Date: 06/23/2017

COURT USE ONLY	
Assigned Bar Roll # _____	
Receipt # _____	
Date of Admission: ____ / ____ / ____	
Revised: ____ / ____ / ____	By: _____

AO 153 (Rev. 6/96)

Name: LAST, de Luca FIRST Daniel		
<p style="text-align: center;"><b>OATH ON ADMISSION</b></p> <p>I, <u>Daniel de Luca</u>, DO SOLEMNLY SWEAR (OR AFFIRM) THAT AS AN ATTORNEY AND AS A COUNSELOR OF THIS COURT I WILL CONDUCT MYSELF UPRIGHTLY AND ACCORDING TO LAW, AND THAT I WILL SUPPORT THE CONSTITUTION OF THE UNITED STATES.</p>		
DATE: 6/23/17	SIGNATURE: 	BAR ID. NO.

AO 153 (Rev. 6/96)

FIRM NAME de Luca/Levine		TEL. NO. 2153830081
FIRM ADDRESS Three Valley Square, Suite 220		
CITY Blue Bell	STATE PA	ZIP CODE 19422
<b>BELOW FOR OFFICE USE ONLY</b>		
SWORN AND SUBSCRIBED BEFORE ME,		DATE
ADMITTED ON MOTION OF: (Movant)		



Supreme Court of Pennsylvania

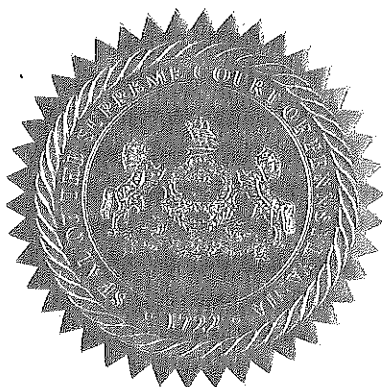
**CERTIFICATE OF GOOD STANDING**

*Daniel J. de Luca, Esq.*

**DATE OF ADMISSION**

*December 15, 1994*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: June 9, 2017**

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk



# Supreme Court of New Jersey



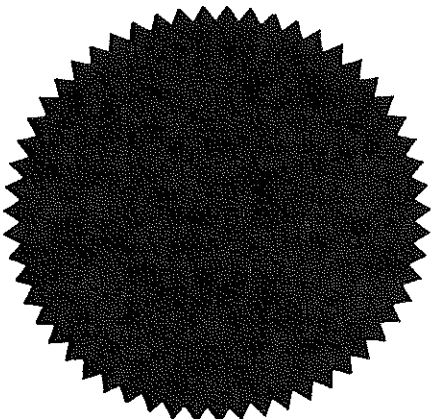
## Certificate of Good Standing

This is to certify that **DANIEL JOSEPH DE LUCA**  
(No. **038451994**) was constituted and appointed an Attorney at Law of New  
Jersey on **December 19, 1994** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if  
the Court's records reflect that the attorney: 1) is current with all assessments imposed as a  
part of the filing of the annual Attorney Registration Statement, including, but not  
limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not  
suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this  
State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-  
12.

Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice  
law in this State.

In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
8TH day of June, 20 17.



Clerk of the Supreme Court


AFFIDAVIT OF SERVICE

KEVIN BRASSIL, being duly sworn, deposes and says: I am not a party to the within action; I am over 18 years of age; I reside in BERGEN COUNTY, NEW JERSEY.

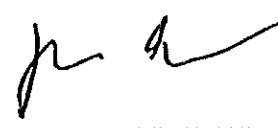
On June 15, 2017, I hereby certify that a true and correct copy of Plaintiff's Motion for Admission *Pro Hac Vice* was filed today utilizing the Court's CM/ECF System, which would thereby automatically notify the following CM/ECF participants:

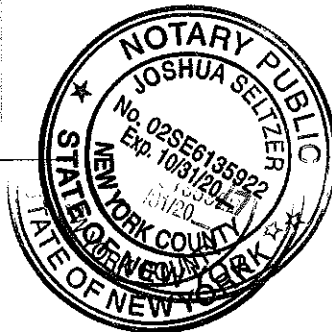
Jonathan M. Bernstein, Esquire  
Goldberg Segalla LLP  
8 Southwoods Boulevard, Suite 300  
Albany, NY 12211

Jeffrey T. Culkin, Esq.  
Gialleonardo & Rayhill  
Nationwide Trial Division - Albany  
950 New Loudon Road Suite 200  
Latham, New York 12110

  
\_\_\_\_\_  
KEVIN BRASSIL

Sworn to before me this  
15<sup>th</sup> day of June 2017.

  
\_\_\_\_\_  
Notary Public



## Motions

1:17-cv-00328-FJS-DJS Community Association Underwriters of America, Inc. v. Hodorowski Homes, LLC et al

MANDATORY-MEDIATION

U.S. District Court

Northern District of New York - Main Office (Syracuse) [LIVE - Version 6.1.1]

## Notice of Electronic Filing

The following transaction was entered by Napoli, Jessica on 6/15/2017 at 10:17 AM EDT and filed on 6/15/2017

**Case Name:** Community Association Underwriters of America, Inc. v. Hodorowski Homes, LLC et al

**Case Number:** 1:17-cv-00328-FJS-DJS

**Filer:** Community Association Underwriters of America, Inc.

**Document Number:** 18

### Docket Text:

**MOTION for Limited Admission Pro Hac Vice of Daniel J. de Luca Filing fee \$100, receipt number 0206-4042367. filed by Community Association Underwriters of America, Inc.. Motions referred to Daniel J. Stewart. (Napoli, Jessica)**

### 1:17-cv-00328-FJS-DJS Notice has been electronically mailed to:

Jeffrey T. Culkin culkinj@nationwide.com, gigliol@nationwide.com

Jessica Napoli jnapoli@clarkfoxlaw.com, kbrassil@clarkfoxlaw.com, mfooster@clarkfoxlaw.com

Jonathan M. Bernstein jbernstein@goldbergsegalla.com, clibertucci@goldbergsegalla.com

Philip A. Davolos, III pdavolos@delucalevine.com, chuber@delucalevine.com, gavitello@delucalevine.com, jzielinski@delucalevine.com, ltrowery@delucalevine.com, philip.davolos@gmail.com, sbranson@delucalevine.com

Terence P. O'Connor toconnor@1stlaw.com, hurley@oobf.com, knickerbocker@1stlaw.com, leroy@oobf.com, monserrate@1stlaw.com

### 1:17-cv-00328-FJS-DJS Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1051896954 [Date=6/15/2017] [FileNumber=3984319-0]  
] [bdc6a2eec4d5186951440091515209605d7175a8e0f88b8cb0645ed19c18bdba24  
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